

LAW OFFICE OF
AARON M. GOLDSMITH

A PROFESSIONAL CORPORATION

225 Broadway, Suite 715

New York, NY 10007

(Tel.) - (914) 588-2679

(Fax) - (212) 566-8165

www.aarongoldsmithlaw.com

MEMO ENDORSED

★ Admitted in NY and CT

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6-8-2018

June 6, 2018

Via ECF

US DISTRICT COURT, SDNY
Hon. Denise L. Cote, USDJ
500 Pearl Street
New York, NY 10007

RE: US v Mahmoud Thiam
Sociedad Saboeira d Nacala
Docket: 17 Cr 0047 (DLC)

Dear Honorable Madame:

As you know, I represented Third-Party Claimant in the above-referenced matter. Please accept this correspondence as a status update and request for further extension of time.

As the Court is aware, the parties were given a deadline of today to inform the Court as to a resolution or to establish a briefing schedule.

The parties have been discussing a possible resolution to the Third-Party Claim. The Government has requested additional documents that I am in the process of obtaining that the parties believe may lead to the final resolution herein.

Accordingly, the parties jointly request an additional extension of sixty (60) days to resolve the matter prior to full briefing schedules. While the parties recognize that the additional sixty (60) days is a lengthy request given prior extensions, I note for the Court's consideration that communications between myself and the Claimant often have lengthy delays due to distance/language and time barriers; as well as the fact that I will be out of the jurisdiction for most of the time-period between July 1 and August 8, 2018.

*A conference shall be held on
August 10 at 11:30 am.*

*Denise Cote
6/8/18*

Thank you for your time and consideration. Should the Court have any further questions, concerns or directives, please feel free to contact the undersigned.

Respectfully submitted,

s/Aaron M. Goldsmith

cc: ELISHA KOBRE, AUSA
via ECF